

Exhibit 93

COPY

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

SURROGATE'S COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

- - - - -x

Petition of James E. Tcheng to Revoke the
Preliminary Letters Heretofore Issued to
Andrew Wang as Preliminary Executor of the
Will Created Under the Last Will and
Testament (and for Further Attendant Relief)
in the Matter of the Estate of

CHI-CHUAN WANG, Deceased.

- - - - -x

One Liberty Plaza, 25th Floor
New York, New York

January 7, 2015
10:00 a.m.

DEPOSITION of WEI ZHENG, in the
above-entitled action, held at the above time and
place, taken before Joseph Danyo V, a Shorthand
Reporter and Notary Public of the State of New
York.

ELISA DREIER
REPORTING CORP.

950 Third Avenue
New York, New York 10022

Telephone: 212-557-5558
Fax: 212-557-0050
Email: production@courtreportingedrc.com

KING-SCT-000007120

44

1 W. Zheng

2 taken.)

3 MR. SAVITSKY: Let's go back on the
4 record.

5 Q. Mr. Zheng, I'd now like to direct
6 your attention to 2005.

7 Do you remember the first time Andrew
8 approached you about finding a buyer for artwork?

9 A. I don't remember which date.

10 Q. Do you know if it was in 2005 or
11 2004?

12 A. It seems to me it was in 2005, but
13 I'm not sure, because it was a long time ago.

14 Q. How long between when you ultimately
15 signed the contract and when Andrew first
16 contacted you -- I'm sorry.

17 What is the period of time between
18 those two events, when Andrew contacted you or
19 when you signed the contract in 2005?

20 A. How long? Let me think. About one
21 month, but I'm not sure. I don't remember
22 exactly how long, because it was a long time.

23 Q. Do you remember what Andrew first
24 said to you?

25 A. I don't remember exactly what he said

1 W. Zheng

2 to me. But, basically, what he said was that he
3 had some paintings, and he was asking whether I
4 could find a buyer for him. That was the gist of
5 it, but as far as exactly what he was saying to
6 me, I don't remember.

7 Q. Were you surprised that Andrew
8 contacted you?

9 A. Yes. A little bit, yes. I was a
10 little bit surprised, because I have never done
11 anything like that with him. I did not
12 understand why he asked me for help. I did not
13 understand why he asked me to find a buyer for
14 him.

15 Q. Is it possible that Andrew asked you
16 to sign the contract, so that he could buy the
17 paintings and pay for them?

18 MR. KUBIC: That's objectionable, but
19 go ahead. Answer the question.

20 A. No. That's not possible, no. Not at
21 all.

22 Q. Did Andrew ever tell you that you
23 would be responsible for paying for the artwork?

24 A. No. He had never told me that. As
25 far as money, how could he ask me to pay for it?

48

1 W. Zheng

2 Q. Was that the United States Postal
3 Service?

4 A. Of course.

5 Q. And you did not keep any of the
6 photographs for yourself?

7 A. No. I was not a buyer. I took a
8 look at the photos. I thought they were all
9 right, and then I send them to my friend.

10 Q. Did you tell Andrew the name of your
11 friend?

12 A. Yes. Of course. I did.

13 Q. Did Andrew contact this person?

14 A. Later, after I make the contact for
15 them, I said to them that as far as the details
16 of the buying and the selling and the money, you
17 guys discussed amongst yourselves. I was not
18 going to get involved.

19 Q. Did you expect to be paid by the
20 buyer?

21 A. No. Not even one cent.

22 Q. So you were doing everything for no
23 money, for free?

24 A. Yes. We were friends, and friends
25 are supposed to help each other. If my friend at

1 W. Zheng

2 the time wanted to give me some money, that was
3 fine, but if he didn't give me any money. He
4 owed me a favor, and later when I needed his
5 help, he would help me out too.

6 Q. Did Andrew ever tell you that you
7 would be responsible for putting \$400,000 into an
8 escrow account in order to purchase these
9 paintings?

10 A. No. I did not get involved with
11 that. I told my friend, hey, I had done enough.
12 You have to figure out amongst yourselves.

13 Basically, I was a something like a
14 matchmaker to introduce them to each other. As
15 far as money, I had nothing to do with it.

16 Q. Do you think it would have been
17 important for Andrew to have told you that you
18 would be personally responsible for paying
19 \$400,000 to the estate?

20 MR. KUBIC: That's objectionable, but
21 go ahead.

22 A. I don't know about this. All I did
23 was to sign for that guy, because the guy asked
24 me to sign for him. I didn't know anything else,
25 and I was not involved in anything else.

50

1 W. Zheng

2 Q. Mr. Zheng, what I'm asking you is
3 whether or not you think it's important who was
4 responsible for paying for those 17 paintings?

5 MR. KUBIC: That's objectionable, but
6 go ahead.

7 A. Of course, that is an important
8 point, but, then again, I was only acting as a
9 bridge between them.

10 I introduced them to each other, and
11 that was it. I washed my hand off at that point.
12 The rest of it was handled by themselves, and how
13 much was supposed to pay and who shall pay what,
14 that was between them. That had nothing to do
15 with me.

16 Q. Did you ever hear from the buyer
17 after you set Andrew up with the buyer in
18 Shanghai?

19 A. No.

20 Q. You never heard from him?

21 A. Afterward, he gave me a call. He say
22 that he felt he was reluctant to tell me, because
23 he went to hospital and find out that he had a
24 terminal disease, and he decided not to purchase
25 those paintings.